INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

(317) 232-8603
(800) 451-6027
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NEW SOURCE CONSTRUCTION PERMIT
OFFICE OF AIR QUALITY

Haas Cabinet Company, Inc.
4414 Bud Prather Road
Speed, Indiana 47172

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: CP019-15050-00109	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary wood kitchen cabinets manufacturing plant.

Responsible Official:	Phillip J. Flora, Plant Manager
Source Address:	4414 Bud Prather Road, Speed, Indiana 47172
Mailing Address:	4414 Bud Prather Road, Speed, Indiana 47172
General Source Phone Number:	(812) 246-4431
SIC Code:	2434
County Location:	Clark
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

(a) Eleven (11) surface coating operations, consisting of the following:

(1) Nine (9) spray booths, constructed in 2002, each with a maximum capacity of 595 units per hour of kitchen components, identified as 1 through 8 and 11, with dry filters for particulate control and exhausting through stacks 1 through 8 and 11, respectively.

(2) One (1) surface coating line, consisting of two (2) UV spray booths, constructed in 2002, with a maximum capacity of 595 units per hour of kitchen components, identified as 9 and 10 with water wash for particulate control and exhausting through stacks 9 and 10, respectively.

(b) Three (3) woodworking operations identified as A, B and C, each with a maximum wood processing rate of 910, 2,180 and 550 pounds of wood processed per hour, respectively, and each equipped with a baghouse for particulate control, identified as A, B and C, respectively.

(c) Five (5) above ground storage tanks, identified as a through e, constructed in 2002, storing stain, top coat, and sealer. a through c each have a volume capacity of 3500 gallons and d and e each have a volume capacity of 4500 gallons.

(d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
One (1) natural gas-fired boiler with heat input of five (5) million Btu per hour.

(e) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(h) Other categories with emissions below insignificant thresholds (VOC less than three (3) pounds per hour:
Wipe on wipe off cleaning operation.

(i) Cleaners and solvents characterized as follows:
(1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;
(2) having a vapor pressure equal to or less than 0,7 kPa; 5mm Hg; or 0.1 psi measured at 20°Celsius 68°F; the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(k) Infrared cure equipment.

(l) Exposure chambers (“towers”, “columns”), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge.

(m) Using 80 tons or less of welding consumables for structural steel and bridge fabrication activities.

(n) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(o) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(q) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter of cyclone.

(r) Paved and unpaved roads and parking lots with public access.

(s) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(t) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(u) Blowndown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(v) On-site fire and emergency response training approved by the department.

(w) Emergency gasoline generators not exceeding 110 horsepower.

(x) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000

actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(y) Filter or coalescer media changeout.

(z) Incinerator model 112B - Batch burns of spray booth filters once per day with a charge capacity of 95 pounds per hour, a two chamber system with operating temperatures of 1450^{o} degrees Fahrenheit Primary and 1800^{o} degrees Fahrenheit secondary.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled “Minor Source Operating Permit”, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).

(e) Pursuant to 326 IAC 2-7-4(a)(1)(A)(ii) and 326 IAC 2-5.1-4, the Permittee shall apply for a Title V operating permit within twelve (12) months of the date on which the source first meets an applicability criterion of 326 IAC 2-7-2.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of any criteria pollutant is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Source Modification [326 IAC 2-7-10.5]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-10.5 whenever the Permittee seeks to construct new emissions units, modify existing emissions units, or otherwise modify the source.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

C.5 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.6 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.7 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.8 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.9 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.10 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 1-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this

condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Record Keeping and Reporting Requirements

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 Annual Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the

source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1 FACILITY OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-5.1-3(c)(2)(C):

(a) Eleven (11) surface coating operations, consisting of the following:

(1) Nine (9) spray booths, constructed in 2002, each with a maximum capacity of 595 units per hour of kitchen components, identified as 1 through 8 and 11, with dry filters for particulate control and exhausting through stacks 1 through 8 and 11, respectively.

(2) One (1) surface coating line, consisting of two (2) UV spray booths, constructed in 2002, with a maximum capacity of 595 units per hour of kitchen components, identified as 9 and 10 with water wash for particulate control and exhausting through stacks 9 and 10, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source shall comply to the following:

(a) The total input usage of volatile organic compounds (VOC) at the eleven (11) coating booths 1 through 11, including coatings, dilution solvents, and cleaning solvents, shall not exceed 249 tons per 12 consecutive month period.

(b) The PM and PM10 emitted from the 11 surface coating facilities shall be limited to a total of less than 1.18 pounds per hour, respectively.

These limits are required to limit the sourcewide potential to emit of VOC, PM and PM10 to less than 250 tons per 12 consecutive month period each. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a), the eleven (11) paint booths (No. 1 through 11) at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (which is equivalent to 0.03 grain per dry standard cubic foot).

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets at coating booths 1 through 11 shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.4 Wood Furniture Coatings [326 IAC 8-11]

Pursuant to 326 IAC 8-11, the requirements for the wood furniture manufacturing operations of coating booths 1 through 11 include the following conditions:

(a) The VOC emissions shall be limited by the following:

(1) For wood furniture manufacturing operations using acid-cured alkyd amino vinyl sealers and acid-cured alkyd amino conversion varnish topcoats, the following:

(A) The sealer shall contain no more than two and three tenths (2.3) pounds VOC per pound solids, as applied.

(B) The topcoat shall contain no more than two (2.0) pounds VOC per pound solids, as applied.

(b) The strippable spray booth coating shall contain no more than eight tenths (0.8) pounds VOC per pound solids, as applied.

D.1.5 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.1.6 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) The wood furniture coating operations at coating booths 1 through 11 are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), immediately upon start up.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the volatile hazardous air pollutant (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average VHAP content across all coatings of 0.8 pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains have a maximum VHAP content of (1.0) pound VHAP per pound solid, as applied.

Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of eight-tenths (0.8) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to 0.8 pound VHAP per pound

solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 0.2 pounds VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed 0.2 pound VHAP per pound solid.

(C) Use a control device to limit emissions to 0.2 VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of 0.8 pounds VOC per pound solids.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

D.1.8 Work Practice Standards [40 CFR 63.803]

The Source shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

(a) Operator training course.

(b) Leak inspection and maintenance plan.

(c) Cleaning and washoff solvent accounting system.

(d) Chemical composition of cleaning and washoff solvents.

(e) Spray booth cleaning.

(f) Storage requirements.

(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).

(h) Line Cleaning.

(i) Gun Cleaning.

(j) Washoff operations.

(k) Formulation assessment plan for finishing operations.

D.1.9 Work Practice Standards [326 IAC 8-11-4]

The source shall prepare and maintain a written work practice implementation plan as specified in 326 IAC 8-11-4. The plan shall include the following conditions:

(a) All equipment shall be maintained according to the manufacturer's specifications;

(b) Spray guns shall be cleaned in an enclosed device that minimizes solvent evaporation, recirculates solvent for reuse, and collects solvent for disposal or recycling;

(c) All finishing materials, gluing materials, cleaning materials, washoff materials, and organic solvents shall be stored in and pumped or drained in closed containers;

(d) Conventional air spray guns shall not be used for applying finishing materials except as specified in 326 IAC 8-11-4(c);

(e) Use closed tanks for washoff operations and drain parts to minimize dripping; and

(f) An organic solvent accounting form shall be maintained to record the following:

(1) The quantity and type of organic solvent used each month for washoff and cleaning;

(2) The number of pieces washed off, and the reason for the washoff; and

(3) The quantity of spent solvent generated from each activity, and the quantity that is recycled on-site or disposed off-site each month.

Compliance Determination Requirements

D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63]

Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

D.1.11 Volatile Organic Compounds (VOC)

(a) Compliance with VOC content limitations contained in Conditions D.1.1, D.1.4 and D.1.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a), using formulation data supplied by the coating manufacturer. The OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedure specified in 326 IAC 8-1-4.

(b) Compliance with Condition D.1.6 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.1.12 Particulate Matter (PM)

The water wash for booth Nos. 9 and 10 and dry filters for booth Nos. 1 through 8 and 11 for PM control shall be in operation at all times when the eleven (11) paint booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.13 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (1 through 8 and 11) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (9 and 10) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.14 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be

taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.4.

(1) A list of each finishing material and strippable booth coating subject to the emission limitations in 326 IAC 8-11-3.

(2) The VOC and solids content, as applied, of each finishing material and strippable booth coating subject to the emission limitations in 326 IAC 8-11-3, and copies of data sheets documenting how the as-applied values were determined.

(3) Copies of all compliance certification reports sent to IDEM.

(c) To document compliance with Condition D.1.6, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VHAP usage limits and/or the VHAP emission limits established in Condition D.1.6.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(d) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plans.

(e) To document compliance with Condition D.1.12 and D.1.13, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Reporting Requirements

(a) An Initial Compliance Report to document compliance with Condition D.1.6, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar days after the start up of the proposed units. The initial compliance report must include data from the entire month that the compliance date falls.

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.6, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

(c) The semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(d) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The reports required in (a), (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.2 FACILITY OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-5.1-3(c)(2)(C):

(b) Three (3) woodworking operations identified as A, B and C, each with a maximum wood processing rate of 910, 2,180 and 550 pounds of wood processed per hour, respectively, and each equipped with a baghouse for particulate control, identified as A, B and C, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

PM and PM10 emissions from facilities A, B and C shall be limited to a total of less than 16.52 tons per twelve (12) consecutive month period, respectively. This limitation is required to limit the sourcewide potential to emit PM10 to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit shall make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.2 Particulate Matter (PM) [326 IAC 6-1-2] [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 6-1-2(a), the woodworking facilities A, B and C shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (which is equivalent to 0.03 grain per dry standard cubic foot).

Compliance with this limit shall make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the woodworking machinery is in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.5 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust (A, B and C) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.2.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping [326 IAC 2-5.1-3(e)(2)]

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking baghouse stacks exhaust.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-5.1-3(c)(2)(C):

(c) Five (5) above ground storage tanks, identified as a thru e, constructed in 2002, storing stain, top coat, and sealer. a thru c each with a volume capacity of 3500 gallons and d and e each with a volume capacity of 4500 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.3.1 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

Any change or modification which may increase the capacity to thirty-nine thousand (39,000) gallons or greater shall require approval from IDEM, OAQ, prior to making the change.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.3.2 Record Keeping Requirements

(a) Pursuant to 326 IAC 8-9-1 (a) & (b) the Permittee shall maintain records at the facility showing the following:

(1) The vessel identification number;

(2) The dimension of the storage vessel;

(3) An analysis showing the capacity of the storage vessel; and

(4) The true vapor pressure of the VOC stored.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.3 Reporting Requirements

An initial report to document compliance with Condition D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the issuance of this permit, and thereafter, within thirty (30) days upon any changes made to these units. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.4 FACILITY OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-5.1-3(c)(2)(C):

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

(f) Incinerator model 112B - Batch burns of spray booth filters once per day with a charge capacity of 95 pounds per hour, a two chamber system with operating temperatures of 1450^{o} degrees Fahrenheit Primary and 1800^{o} degrees Fahrenheit secondary. [326 IAC 4-2-1]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.4.1 Particulate Matter Limitation (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a), following operations listed as Insignificant Activity section of this TSD, shall not allow or permit discharge to the atmosphere particulate matter in excess of 0.03 grains per dry standard cubic foot (gr/dscf).

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

D.4.2 Solid Waste Incinerator [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), this solid waste natural gas incinerator, rated at 250 pounds per hour shall:

(a) Consist of primary and secondary chambers or the equivalent.

(b) Be equipped with a primary burner unless burning wood products.

(c) Comply with 326 IAC 5-1 (Opacity limitations).

(d) Be maintained properly as specified by the manufacturer and approved by IDEM.

(e) Be operated according to the manufacturer's recommendation and only burn waste approved by IDEM.

(f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.

(g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented.

(h) Not create a nuisance or a fire hazard.

(i) Not emit particulate matter (PM) in excess of 0.3 pounds per 1000 pounds of dry exhaust gas corrected to fifty percent (50%) excess air.

The operation of this incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

CONSTRUCTION AND OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Haas Cabinet Company, Inc.
Address:	4414 Bud Prather Road, Speed, Indiana 47172
City:	Clark
Phone #:	(812) 246-4431
CP #:	019-15050-00109

I hereby certify that Haas Cabinet Company, Inc. is

9 still in operation.
9 no longer in operation.

I hereby certify that Haas Cabinet Company, Inc. is

9 in compliance with the requirements of CP 019-15050-00109.
9 not in compliance with the requirements of CP 019-15050-00109.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Quarterly Report

Source Name: Haas Cabinet Company, Inc.
Source Address: 4414 Bud Prather Road, Speed, Indiana 47172
Mailing Address: 4414 Bud Prather Road, Speed, Indiana 47172
CP No.: 019-15050-00109
Facility: Eleven (11) surface coating booths (No. 1 through 11)
Parameter: VOC
Limit: 249 tons per twelve consecutive month rolling total

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

SEMI-ANNUAL REPORT FORM

VOC Usage

Source Name: Haas Cabinet Company, Inc.
Source Address: 4414 Bud Prather Road, Speed, Indiana 47172
Mailing Address: 4414 Bud Prather Road, Speed, Indiana 47172
CP No.: 019-15050-00109
Facility: Eleven (11) surface coating booths (No. 1 through 11)
Parameter: VOC
Limit: Topcoat & Sealers Systems:

1) Acid Cured Topcoat - 2.0 lb VOC/ lb solids
2) Acid Cured Sealer - 2.3 lb VOC/ lb solids

Strippable spray booth coating - 0.8 lb VOC/lb solids

YEAR: _____

Month	Top coat & Sealer - Acid cured topcoat	Top coat & Sealer - Acid cured sealer	Strippable spray booth coating
1			
2			
3			
4			
5			
6			

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Semi-Annual Report

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Haas Cabinet Company, Inc.
Source Address: 4414 Bud Prather Road, Speed, Indiana 47172
Mailing Address: 4414 Bud Prather Road, Speed, Indiana 47172
CP No.: 019-15050-00109
Facility: Eleven (11) surface coating booths (No. 1 through 11)
Parameter: VOC and VHAPs - NESHAP
Limit:
(1) Finishing materials (stains) -1.0 lb VHAP/lb Solids
(2) Finishing materials (washcoats, sealers, topcoats, basecoats, enamels - 0.8 lb VHAP/lb Solids
(3) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
(4) All other thinner mixtures - 10% VHAP content by weight
(5) Foam adhesives meeting the upholstered seating flammability requirements - 0.2 lb VHAP/lb Solids
(6) All other contact adhesives - 0.2 lb VHAP/lb Solids
(7) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR:___ _____

Month	Finishing materials (lb VHAP/lb Solid)		Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam Adhesives (upholstered) (lb VHAP/lb Solid)	Contact Adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
	(1)	**(2)**	**(3)**	**(4)**	**(5)**	**(6)**	**(7)**
1							
2							
3							
4							
5							
6							

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.
Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____R, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____ _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____

(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____
_____

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a New Source Construction Permit

Source Name: Haas Cabinet Company, Inc.
Source Location: 4414 Bud Prather Road, Speed, Indiana 47172
County: Clark
SIC Code: 2434
Operation Permit No.: CP 019-15050-00109
Permit Reviewer: Adeel Yousuf/EVP

On February 16, 2002, the Office of Air Quality (OAQ) had a notice published in the Evening News, Jeffersonville, Indiana, stating that Haas Cabinet Company, Inc had applied for a New Source Construction Permit to operate a wood kitchen cabinets manufacturing plant. The notice also stated that OAQ proposed to issue a construction permit for this operation and provided information on how the public could review the proposed construction permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this construction permit should be issued as proposed.

Upon further review the OAQ has decided to make the following changes to the New Source Construction Permit. Bolded language has been added and the language with a line through it has been deleted.

1. Condition D.1.6 of the construction permit contains the 40 CFR Part 63, Subpart JJ VHAP emission standards for the existing source. However, this source is considered a new source construction and the new source VHAP emission standards should apply to wood furniture coating operations at this source. Following is the revised Condition D.1.6 with new source VHAP emission standards.

D.1.6 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) The wood furniture coating operations at coating booths 1 through 11 are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), immediately upon start up.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the volatile hazardous air pollutant (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average VHAP content across all coatings of ~~1.0~~ **0.8** pound VHAP per pound solids; or

(B) ~~Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. All other thinners have a 10.0 percent maximum VHAP content by weight; or~~ **Use compliant finishing**

materials in which all stains have a maximum VHAP content of (1.0) pound VHAP per pound solid, as applied.

Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of eight-tenths (0.8) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions **to 0.8 pound VHAP per pound solids**; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed ~~1.8~~ **0.2** pounds VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed ~~1.0~~ **0.2** pound VHAP per pound solid.

(C) Use a control device to limit emissions **to 0.2 VHAP per pound solids**.

(3) The strippable spray booth material shall have a maximum VOC content of 0.8 pounds VOC per pound solids.

2. Semi-annual Wood Furniture NESHAP (Subpart JJ) reporting form has also been revised to reflect the Condition D.1.6 changes.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Semi-Annual Report
VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Haas Cabinet Company, Inc.
Source Address: 4414 Bud Prather Road, Speed, Indiana 47172
Mailing Address: 4414 Bud Prather Road, Speed, Indiana 47172
CP No.: 019-15050-00109
Facility: Eleven (11) surface coating booths (No. 1 through 11)
Parameter: VOC and VHAPs - NESHAP
Limit:
(1) Finishing ~~operations~~ **materials (stains)** -1.0 lb VHAP/lb Solids
(2) Finishing materials (washcoats, sealers, topcoats, basecoats, enamels - 0.8 lb VHAP/lb Solids
(~~2~~**3**) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
(~~3~~**4**) All other thinner mixtures - 10% VHAP content by weight
(~~4~~**5**) Foam adhesives meeting the upholstered seating flammability requirements - ~~1.8~~ **0.2** lb VHAP/lb Solids
(~~5~~**6**) All other contact adhesives - ~~1.0~~ **0.2** lb VHAP/lb Solids
(~~6~~**7**) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR:_____

Month	Finishing ~~Operations~~ **materials** (lb VHAP/lb Solid)		Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam Adhesives (upholstered) (lb VHAP/lb Solid)	Contact Adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
	(1)	**(2)**	**(3)**	**(4)**	**(5)**	**(6)**	**(7)**
1							
2							
3							
4							
5							
6							

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.
Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

3. The Annual Notification Form has been corrected for a minor typographical mistake.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

CONSTRUCTION AND OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Haas Cabinet Company, Inc.
Address:	4414 Bud Prather Road, Speed, Indiana 47172
City:	Clark
Phone #:	(812) 246-4431
CP #:	019-15050-00109

I hereby certify that ~~Dynamax Corporation~~ **Haas Cabinet Company, Inc.** is
9 still in operation.
9 no longer in operation.

I hereby certify that ~~Dynamax Corporation~~ **Haas Cabinet Company, Inc.** is
9 in compliance with the requirements of CP 019-15050-00109.
9 not in compliance with the requirements of CP 019-15050-00109.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of

how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a New Source Construction Permit

Source Background and Description

Source Name:	Haas Cabinet Company, Inc.
Source Location:	4414 Bud Prather Road, Speed, Indiana 47172
County:	Clark
SIC Code:	2434
Operation Permit No.:	T019-15050-00109
Permit Reviewer:	Adeel Yousuf/EVP

The Office of Air Quality (OAQ) has reviewed an application from Haas Cabinet Company, Inc. relating to the construction and operation of a source that manufactures wood kitchen cabinets.

History

Haas Cabinet Company, Inc. submitted an application on November 9, 2001 for the construction and operation of a new source to be located at 4414 Bud Prather Road, Speed, Indiana. Haas Cabinet Company, Inc., currently operates a similar source at 625 West Utica Street, Sellersburg, Indiana, and is operating under existing Part 70 No. T019-5797-00016, issued on August 5, 1999. The new source to be located in Speed, Indiana will have all the existing operations moved from the Sellersburg location. Therefore, the source manufacturing capacity and operations will be identical to those reflected in the current permit (T019-5797-00016). Therefore, this application is reviewed as a new source review at the new Speed location.

Permitted Emission Units and Pollution Control Equipment

This is an initial approval, and no previous permits, registrations, modifications, or exemptions have been issued to this source at its new location.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following emission units and pollution control devices:

(a) Eleven (11) surface coating operations, consisting of the following:

(1) Nine (9) spray booths, constructed in 2002, each with a maximum capacity of 595 units per hour of kitchen components, identified as 1 through 8 and 11, with dry filters for particulate control and exhausting through stacks 1 through 8 and 11, respectively.

(2) One (1) surface coating line, consisting of two (2) UV spray booths, constructed in 2002, with a maximum capacity of 595 units per hour of kitchen components, identified as 9 and 10 with water wash for particulate control and exhausting through stacks 9 and 10, respectively.

(b) Three (3) woodworking operations identified as A, B and C, each with a maximum wood processing rate of 910, 2,180 and 550 pounds of wood processed per hour, respectively, and each equipped with a baghouse for particulate control, identified as A, B and C, respectively.

(c) Five (5) above ground storage tanks, identified as a through e, constructed in 2002, storing stain, top coat, and sealer. a through c each have a volume capacity of 3500 gallons and d and e each have a volume capacity of 4500 gallons.

(d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
One (1) natural gas-fired boiler with heat input of five (5) million Btu per hour.

(e) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(h) Other categories with emissions below insignificant thresholds (VOC less than three (3) pounds per hour:
Wipe on wipe off cleaning operation.

(i) Cleaners and solvents characterized as follows:
(1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;
(2) having a vapor pressure equal to or less than 0,7 kPa; 5mm Hg; or 0.1 psi measured at 20°Celsius 68°F; the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(k) Infrared cure equipment.

(l) Exposure chambers (“towers”, “columns”), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge.

(m) Using 80 tons or less of welding consumables for structural steel and bridge fabrication activities.

(n) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(o) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(q) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter of cyclone.

(r) Paved and unpaved roads and parking lots with public access.

(s) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(t) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(u) Blowndown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(v) On-site fire and emergency response training approved by the department.

(w) Emergency gasoline generators not exceeding 110 horsepower.

(x) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(y) Filter or coalescer media changeout.

(z) Incinerator model 112B - Batch burns of spray booth filters once per day with a charge capacity of 95 pounds per hour, a two chamber system with operating temperatures of 1450^{o} degrees Fahrenheit Primary and 1800^{o} degrees Fahrenheit secondary.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

This new source has no existing approvals. However, since equipment is being re-located to this new source from the existing source located at 625 West Utica St., Sellersburg, Indiana, similar relevant source and facility conditions from existing Part 70 Permit No. T019-5797-00016, issued on August 5, 1999 were used as referenced to this Permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on November 9, 2001. Additional information was received on January 11, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, seven (7) pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1953.77
PM-10	1953.77
SO_2	0.50
VOC	719.97
CO	3.90
NO_x	2.80

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	21.80
Toluene	90.02
Formaldehyde	0.78
Ethyl Benzene	4.26
TOTAL	116.86

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

This is a new source and no previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Surface Coating Booths (1 through 11)	5.20	5.20	--	249.0	--	--	(2)
Wood Working Operation	16.52	16.52	--	--	--	--	--
Insignificant Activities	1.70	1.70	0.50	0.70	3.90	2.80	negl.
Total Emissions	23.42	23.42	0.50	< 250 (1)	3.90	2.80	(2)

Notes:
(1) Source-wide emissions of VOC will be limited to less than 250 tons per year.
(2) HAP emissions will be limited by the requirements of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, 40 CFR 63, Subpart JJ.

County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The one (1) natural gas fired incinerator (112B) with maximum heat input rate of 1.2 MMBtu/hr and maximum charge capacity of 95 pounds per hour, is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.50, Subpart E) because the maximum charge capacity of this incinerator is below the rule applicability threshold of 50 tons per day.

(b) One (1) boiler installed in 2002, rated at 5.0 MMBtu per hour is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because boiler's heat input capacity is less than the rule applicability threshold of 10 MMBtu per hour.

(c) Five (5) above ground storage tanks, identified as a through e, constructed in 2002, are not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.110, Subpart Kb), because each tank has storage capacity less than the rule applicability threshold of 40 cubic meters (m^3) (10,567 gallons).

(d) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, 40 CFR 63, Subpart JJ.

Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions upon startup:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

(4) The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

(A) Operator training course.

(B) Leak inspection and maintenance plan.

(C) Cleaning and washoff solvent accounting system.

(D) Chemical composition of cleaning and washoff solvents.

(E) Spray booth cleaning.

(F) Storage requirements.

(G) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).

(H) Line cleaning.

(I) Gun cleaning.

(J) Washoff operations.

(K) Formulation assessment plan for finishing operations.

(5) Records shall be maintained in accordance with (A) through (E) below. Records maintained for (A) through (E) shall be complete and sufficient to establish compliance with the VHAP usage limits.

(A) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(B) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(C) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.

(D) The VHAP content in weight percent of each thinner used.

(E) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(6) An Initial Compliance Report shall be submitted within sixty (60) days following start up. The Initial Compliance Report must include data from the entire month that the compliance date falls.

(7) A semi-annual Continuous Compliance Report shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

(A) January 1 through June 30.

(B) July 1 through December 31.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source, constructed after August 7, 1980, is not subject to 326 IAC 2-2 (PSD) since it is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and its sourcewide emissions shall be limited below the major source threshold of 250 tons of VOC, PM and PM10 emissions per twelve (12) consecutive month period. Therefore, the PSD rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

326 IAC 2-4.1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This source is subject to the National Emissions Standards for Hazardous Air Pollutants 40 CFR Part 63, Subpart JJ. Compliance with 40 CFR Part 63, Subpart JJ, as an applicable standard issued pursuant to Section 112(d) of the Clean Air Act, makes the requirements of 326 IAC 2-4.1 not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year) of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

This source is not located in Jeffersonville township, Clark county. Therefore, pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute

averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 4-2-1 (Incinerators)

The natural gas fired incinerator, rated at 1.2 MMBtu/hr, is subject to the requirements of 326 IAC 4-2-1. Pursuant to this rule, the incinerator shall:

(a) consist of primary and secondary chambers or the equivalent;

(b) be equipped with a primary burner unless burning wood products;

(c) comply with 326 IAC 5-1 and 326 IAC 2;

(d) be maintained properly as specified by the manufacturer and approved by the commissioner;

(e) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;

(f) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;

(g) be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;

(h) not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and

(i) not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

The incinerator has a maximum exhaust rate of 0.28 pounds of PM per 1000 pounds of dry exhaust gas, corrected to fifty percent (50%) excess air (see Appendix A, page 6 of 7). Therefore, the incinerator is in compliance with this rule. There will be no compliance monitoring conditions inserted into the permit for this insignificant activity since it does not have a control device and does not have actual pollutant emissions exceeding 25 tons per year.

326 IAC 6-1-2 (Particulate Emission Limitations)

This source is located in Clark County, which is listed in 326 IAC 6-1-7, but the source is not specifically listed in 326 IAC 6-1-17. Since the actual PM emissions from the entire source are greater than ten (10) tons per year, the requirements of 326 IAC 6-1-2 are applicable.

(a) Pursuant to 326 IAC 6-1-2(b)(5), no person shall operate a fossil fuel combustion steam generator so as to discharge or cause to be discharged any gases unless such gases are limited to a particulate matter content of no greater than 0.01 grains per dry standard cubic foot (dscf) for all gaseous fuel-fired steam generators. The one (1) natural gas fired hot water boiler constructed in 2002, identified as 1-HWB-1 and 2, rated at 5.0 MMBtu per hour, is not subject to the particulate matter limitations of 326 IAC 6-1-2, because the

boiler is hot water boilers and not used for steam generation.

(b) Pursuant to 326 IAC 6-1-2(a), the eleven (11) paint booths (No. 1 through 11) at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (which is equivalent to 0.03 grain per dry standard cubic foot).

The dry filters shall be in operation at all times that the nine (9) surface coating booths (No. 1 through 8, and 11) are in operation, in order to comply with this limit.

The water wash system shall be in operation at all times that the two (2) surface coating booths (No. 9 and 10) are in operation, in order to comply with this limit.

(c) Pursuant to 326 IAC 6-1-2(a), the woodworking facilities A, B and C shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (which is equivalent to 0.03 grain per dry standard cubic foot).

The grain loading for each of the woodworking facilities A, B and C is 0.01 gr/dscf, therefore, these facilities are in compliance with the rule 326 IAC 6-1-2.

The three (3) baghouses venting through stacks A, B, and C shall be in operation at all times the respective woodworking facilities are in operation, in order to comply with this limit.

(d) Pursuant to 326 IAC 6-1-2(a), the equipment listed at (j) and (x) in the **New Emission Units and Pollution Control Equipment** section of this TSD, shall not allow or permit discharge to the atmosphere particulate matter in excess of 0.03 grains per dry standard cubic foot (gr/dscf).

There will be no compliance monitoring condition inserted into the permit since the insignificant activities have no control devices and do not have actual emissions exceeding 25 tons per year.

326 IAC 6-3-2 (Process Operations)

The process operations at the source are subject to the requirement of 326 IAC 6-1-2, therefore 326 IAC 6-3 is no applicable.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

This source is subject to 326 IAC 8-2-12 for each of spray booths 1, 2, 5-9 and 12-17, because they are constructed after 1990, and have the potential to emit more than 15 pounds per day of VOC. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets at booths 1 through 11 shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of

application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. Since Haas Cabinet Company uses air assisted airless spray applications and roll coating, they are in compliance with 326 IAC 8-2-12.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. Even though the source has potential VOC emissions greater than ten (10) tons per year from the coating facilities, each of the surface coating booths is subject to 326 IAC 8-2-12 and, pursuant to 326 IAC 8-7-2 (Applicability), the VOC emitted from these facilities is not considered in the rule applicability determination. Excluding such facility emissions, the requirements of 326 IAC 8-7 are not applicable to this source.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirement of the rule if located in Clark, Floyd, Lake or Porter Counties. Stationary vessels (a through e) with capacities less than 39,000 gallons are only subject to the reporting and record keeping requirements of 326 IAC 8-9-6(a) & (b). These records shall be maintained for the life of each vessel including the vessel identification number, the vessel dimensions, and the vessel capacity.

326 IAC 8-11 Wood Furniture Coatings [326 IAC 8-11]

This source is subject 326 IAC 8-11, because it is located in Clark County with the SIC code of 2434 and has potential emissions greater than 25 tons of VOC per year.

Pursuant to 326 IAC 8-11, the requirements for the wood furniture manufacturing operations include the following conditions:

(a) The VOC emissions shall be limited by the following:
  (1) For wood furniture manufacturing operations using acid-cured alkyd amino vinyl sealers and acid-cured alkyd amino conversion varnish topcoats, the following:
    (A) The sealer shall contain no more than two and three tenths (2.3) pounds VOC per pound solids, as applied.
    (B) The topcoat shall contain no more than two (2.0) pounds VOC per pound solids, as applied.

(b) The strippable spray booth coating shall contain no more than eight tenths (0.8) pounds VOC per pound solids, as applied.

(c) The source shall follow work practice standards as specified in 326 IAC 8-11-4.

(d) A semi-annual summary report shall be prepared and submitted to IDEM, OAQ, to document the ongoing compliance status of the wood furniture coating operations.

Based on the information submitted by the source and calculations made, the coatings used at this facility are in compliance with the requirements of this rule.

Testing Requirements

Testing is not required for this source. The surface coating booths identified as Booths 1, 2, 5-9, 12-17 because compliance with the VOC emission limits can be demonstrated through record keeping and reporting. The woodworking operations are controlled by baghouse and, along with other processes, have emissions below the relevant allowable particulate matter emission rates.

Compliance Requirements

Permits issued under 326 IAC 2-5.1 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-5.1-3(e). As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The surface coating booths (No. 1 through 11) have applicable compliance monitoring conditions as specified below:

   (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (1 through 8 and 11) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

   (b) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (9 and 10) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response

steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the water wash and dry filters for the surface coating booths must operate properly to ensure compliance with 326 IAC 6-3-2(c) (Process Operations).

2. The woodworking operations have applicable compliance monitoring conditions as specified below:

(a) Daily visible emissions notations of the all woodworking baghouse stacks (A, B and C) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

These monitoring conditions are necessary because baghouses for the woodworking operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The construction and operation of this wood kitchen cabinet manufacturing source shall be subject to the conditions of the attached proposed **Construction Permit No. CP019-15050-00109.**

Appendix A: Emission Calculations

Company Name: Haas Cabinet Company, Inc.
Address City IN Zip: 4414 Bud Prather Rd, Speed, Indiana 47172
Part 70 No.: T019-15050-00109
Reviewer: Adeel Yousuf/EVP
Date: 02/04/2002

Uncontrolled Potential Emissions (tons/year)

Pollutant	Emissions Generating Activity: Surface Coating	Wood Working	Insignificant Activities	**TOTAL**
PM	300.18	1,651.89	1.70	1953.77
PM10	300.18	1,651.89	1.70	1953.77
SO2	0.00	0.00	0.50	0.50
NOx	0.00	0.00	2.80	2.80
VOC	719.27	0.00	0.70	719.97
CO	0.00	0.00	3.90	3.90
total HAPs	116.85	0.00	negl.	116.85
worst case single HAP	(Toluene) 90.02	0.00	negl.	(Toluene) 72.32

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

Pollutant	Emissions Generating Activity: Surface Coating	Wood Working	Insignificant Activities	**TOTAL**
PM	5.20	16.52	1.70	23.42
PM10	5.20	16.52	1.70	23.42
SO2	0.00	0.00	0.50	0.50
NOx	0.00	0.00	2.80	2.80
VOC	249.00	0.00	0.70	249.70
CO	0.00	0.00	3.90	3.90
total HAPs	116.85	0.00	negl.	116.85
worst case single HAP	(Toluene) 90.02	0.00	negl.	(Toluene) 72.32

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Haas Cabinet Company, Inc.
Address City IN Zip: 4414 Bud Prather Rd, Speed, Indiana 47172
CP: 019-15050
Plt ID: 019-00109
Date: 02/01/2002
Reviewer: Adeel Yousuf / EVP

Material	Booth Number	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Nelsonite 15BO2	1	7.17	85.00%	0.0%	85.00%	0.0%	15.00%	0.00008654	595	6.09	6.09	0.31	7.53	1.37	0.21	40.63	15%
Cinnamon Stain VNB 0021	2-8	7.49	95.78%	0.0%	95.78%	0.0%	4.22%	0.00177581	595	7.17	7.17	7.58	181.92	33.20	1.24	170.00	15%
Hickory Medium VNB 0022	2-8	7.59	94.31%	0.0%	94.31%	0.0%	5.69%	0.00128426	595	7.16	7.16	5.47	131.27	23.96	1.23	125.80	15%
Medium Stain VNB 0018	2-8	7.6	93.13%	0.0%	93.13%	0.0%	6.87%	0.00174985	595	7.08	7.08	7.37	176.86	32.28	2.02	103.03	15%
Golden Oak Stain VNY0003	2-8	7.45	97.52%	0.0%	97.52%	0.0%	2.48%	0.00101945	595	7.27	7.27	4.41	105.77	19.30	0.42	292.95	15%
Light Maple Honey VNR0006	2-8	6.75	73.74%	0.0%	73.74%	0.0%	1.01%	0.00545726	595	4.98	4.98	16.16	387.89	70.79	21.43	492.82	15%
UV topcoat PKF0094	9, 10	7.76	56.89%	0.0%	56.89%	0.0%	33.50%	0.02830227	595	4.41	4.41	74.34	1784.21	325.62	209.74	13.18	15%
White Top Coat AUW 0243	4, 5, 6	9.4	54.04%	0.0%	54.04%	0.0%	46.00%	0.00078406	595	5.08	5.08	2.37	56.87	10.38	7.50	11.04	15%
Durasyn clear top coat kkf0088	11	9.06	0.61%	0.0%	0.61%	0.0%	99.39%	0.00099176	595	0.06	0.06	0.03	0.78	0.14	19.78	0.06	15%
Pearl Stain VNW0005	2-8	7.07	62.86%	0.0%	62.86%	0.0%	7.39%	0.00181562	595	4.44	4.44	4.80	115.23	21.03	10.56	60.14	15%
Honey Stain VNB 0019	2-8	7.45	96.68%	0.0%	96.68%	0.0%	3.31%	0.00585707	595	7.20	7.20	25.10	602.42	109.94	3.21	217.60	15%
Rose Stain VNR 0006	2-8	7.63	91.29%	0.0%	91.29%	0.0%	8.71%	0.00129638	595	6.97	6.97	5.37	128.95	23.53	1.91	79.97	15%
Golden Oak Stain VNY0003	2-8	7.45	97.52%	0.0%	97.52%	0.0%	2.48%	0.00101945	595	7.27	7.27	4.41	105.77	19.30	0.42	292.95	15%
Durasyn clear top coat AUF0664	4, 5, 6	7.88	57.87%	0.0%	57.87%	0.0%	34.67%	0.00099176	595	4.56	4.56	2.69	64.58	11.79	7.29	13.15	15%
White Primer AUW 0234	4, 5, 6	9.87	51.67%	0.0%	51.67%	0.0%	48.30%	0.00125138	595	5.10	5.10	3.80	91.13	16.63	13.22	10.56	15%
Total Uncontrolled Potential Emissions				**Add worst case coating to all solvents**								**164.22**	**3941.19**	**719.27**	**300.18**		

	Controlled Potential Emissions						
	Material Usage Limitation	Control Efficiency: VOC	Control Efficiency: PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
Total Controlled Potential Emissions:	34.62%	0.00%	95.00%	**56.85**	**1364.44**	**249.01**	**5.20**

Notes: At a 35.20% annual material usage limitation, VOC emissions are limited to less than 249 tons per year.
Maximum Material usage (gal/unit) is for 595 individual pieces being processed per hour, which is equivalent to 133 cabinets per hour (1 cabinet = 4.47 pieces)
Maximum Material usage (gal/unit) represents the total material used in all the booths listed.
Transfer efficiency of 15% represents the worst case transfer efficiency for all the booths.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Sum of worst case coatings in each booth

HAP Emission Calculations

Company Name: Haas Cabinet Company, Inc.
Plant Location: 4414 Bud Prather Rd, Speed, Indiana 47172
CP: 019-15050
Plant ID: 019-00109
Permit Reviewer: Adeel Yousuf / EVP
Date: 02/01/2002

Material	Booth Number	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Total
Nelsonite 15BO2	1	7.17	0.00008654	595	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Cinnamon Stain VNB 0021	2-8	7.49	0.00177581	595	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Hickory Medium VNB 0022	2-8	7.59	0.00128426	595	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Medium Stain VNB 0018	2-8	7.6	0.00174985	595	2.10%	0.00%	0.00%	0.00%	0.73	0.00	0.00	0.00	0.73
Golden Oak Stain VNY0003	2-8	7.45	0.00101945	595	1.30%	0.00%	0.00%	0.00%	0.26	0.00	0.00	0.00	0.26
Light Maple Honey VNR0006	2-8	6.75	0.00545726	595	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
UV topcoat PKF0094	9, 10	7.76	0.02830227	595	0.00%	15.00%	0.00%	0.00%	0.00	85.85	0.00	0.00	85.85
White Top Coat AUW 0243	4, 5, 6	9.4	0.00078406	595	30.00%	0.00%	0.10%	10.00%	5.76	0.00	0.02	1.92	7.70
Durasyn clear top coat kkf0088	11	9.06	0.00099176	595	0.00%	0.00%	1.00%	0.00%	0.00	0.00	0.23	0.00	0.23
Pearl Stain VNW0005	2-8	7.07	0.00181562	595	0.00%	5.00%	0.00%	0.00%	0.00	1.67	0.00	0.00	1.67
Honey Stain VNB 0019	2-8	7.45	0.00585707	595	5.00%	0.00%	0.00%	0.00%	5.69	0.00	0.00	0.00	5.69
Rose Stain VNR 0006	2-8	7.63	0.00129638	595	0.00%	1.00%	0.00%	0.00%	0.00	0.26	0.00	0.00	0.26
Golden Oak Stain VNY0003	2-8	7.45	0.00101945	595	0.00%	1.00%	0.00%	0.00%	0.00	0.20	0.00	0.00	0.20
Durasyn clear top coat AUF0664	4, 5, 6	7.88	0.00099176	595	15.00%	10.00%	1.00%	5.00%	3.06	2.04	0.20	1.02	6.31
White Primer AUW 0234	4, 5, 6	9.87	0.00125138	595	19.60%	0.00%	1.00%	4.10%	6.31	0.00	0.32	1.32	7.95
									21.80	90.02	0.78	4.26	116.85

Total Uncontrolled Potential Emissions

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations

Particulater Matter (PM) Emissions
Wood Working Opration

Company Name: Haas Cabinet Company, Inc.
Address City IN Zip: 4414 Bud Prather Rd, Speed, Indiana 47172
Part 70: 019-15050
Plt ID: 019-00109
Reviewer: Adeel Yousuf / EVP
Date: 01/14/2002

Unit A:

PM/PM10:	0.01	gr/acf outlet x	18000	acf/min x	60	min/hr /	7000	gr/lb x	4.38	ton/yr / lb/hr	0.01	(1- control effeciency) =	**675.77 tons/yr (uncontrolled)**
where the baghouse control efficiency is listed at			99.00%										**6.76 tons/yr (controlled)**

Unit B:

PM/PM10:	0.01	gr/acf outlet x	14000	acf/min x	60	min/hr /	7000	gr/lb x	4.38	ton/yr / lb/hr	0.01	(1- control effeciency) =	**525.60 tons/yr (uncontrolled)**
where the baghouse control efficiency is listed at			99.00%										**5.26 tons/yr (controlled)**

Unit C:

PM/PM10:	0.01	gr/acf outlet x	12000	acf/min x	60	min/hr /	7000	gr/lb x	4.38	ton/yr / lb/hr	0.01	(1- control effeciency) =	**450.51 tons/yr (uncontrolled)**
where the baghouse control efficiency is listed at			99.00%										**4.51 tons/yr (controlled)**

Total Emissions: **1651.89 tons/yr (uncontrolled)**
Total Emissions: **16.52 tons/yr (controlled)**

Methodology

Uncontrolled PM/PM10 = grain loading (gr/acf outlet) * Flow rate (acfm) * (60 min/hr) * (1 lb/7000 gr) * 4.38 (tons/yr / lb/hr) / (1- control effeciency %)

Appendix A: Emission Calculations
Industrial/Commercial Incinerator

Company Name: Haas Cabinet Company, Inc.
Address City IN Zip: 4414 Bud Prather Rd, Speed, Indiana 47172
FESOP Renewal No.: T019-15050-00109
Plt ID: 019-00109
Reviewer: Adeel Yousuf/EVP
Date: 01/07/2002

	THROUGHPUT	THROUGHPUT
	lbs/hr	ton/yr
Potential	95	416.1
Limited	95	416.1

	POLLUTANT				
	PM	SO2	CO	VOC	NOX
Emission Factor in lb/ton	7.0	2.5	10.0	3.0	3.0
Potential Emissions in ton/yr	1.5	0.5	2.1	0.6	0.6
Limited Emissions in ton/yr	1.5	0.5	2.1	0.6	0.6

Methodology

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers
Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

Appendix A: Emissions Calculations
Waste Incinerator Compliance with 326 IAC 4-2-2

Company Name: Haas Cabinet Company, Inc.
Address City IN Zip: 4414 Bud Prather Rd, Speed, Indiana 47172
TV: T019-15050-00109
Reviewer: Adeel Yousuf/EVP
Date: 01/07/2002

Potential PM emissions	0.34	lb/hr
Stack gas flow rate	800.00	acfm
Gas temperature	1800.00	deg F
Incinerator Throughput	95.00	lb/hr

Q,std = Volumetric flow rate at Standard Temperature

Q,std = 800 acfm x 529 / 2328 deg R = **181.79** dscfm

Cs = PM Concentration

Cs = 0.34 lb/hr / 181.79 dscfm x 7000 gr/lb / 60 min/hr = **0.219** gr/dscf

Corrected to 50% excess air

Cs, corrected = 0.219 gr/dscf x (100+0)% / 150% = **0.146** gr/dscf

Ideal Gas Law

Specific Volume = R x T / P x Mw where

R = gas constant = 21.9(in Hg)(ft^3) / (lb mol)(deg R)
T = standard temp = 529 deg R
P = standard pressure = 29.45 in Hg
Mw = avg molecular weight of air = 29 lb/lbmol

Specific Volume = **13.565** cf/lb air

Cs, corrected = 0.146 gr/dscf x 13.565 cf/lb air = **1.985** gr/lb air

1.985 gr/lb air x 1/7000 lb pm/gr = 0.00028 lb PM/lb dry gas = **0.2836** lb PM/1000 lb dry gas

Maximum allowable particulate emission pursuant to 326 IAC 4-2-2 is 0.3 lb PM/1000 lb dry gas.
The medical waste incinerator is in compliance with 326 IAC 4-2-2.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 10
Commercial Boiler

Company Name: **Haas Cabinet Company, Inc.**
Address City IN Zip: **4414 Bud Prather Rd, Speed, Indiana 47172**
TV: **T019-15050-00109**
Reviewer: **Adeel Yousuf/EVP**
Date: **01/07/2002**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.00	43.8

One (1) natural gas fired boiler.

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.2	0.2	0.0	2.2	0.1	1.8

Methodology

MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36
Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton